

1 Miles F. Ehrlich (CSB 237954)
2 Amy E. Craig (CSB 269339)
3 RAMSEY & EHRLICH LLP
4 803 Hearst Avenue
5 Berkeley, CA 94710
6 (510) 548-3600
7 (510) 291-3060 fax
8 miles@ramsey-ehrllich.com
9 amy@ramsey-ehrllich.com

10 Attorneys for Defendant
11 *John Ching En Lee*

FILED

APR 17 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES,

16 Plaintiff;

17 vs.

18 JOHN CHING EN LEE,

19 Defendant.

Case No.: 14-MJ-70256

STIPULATION AND ~~[PROPOSED]~~ ORDER TO
CONTINUE STATUS CONFERENCE

Court: Judge Joseph C. Spero

Date: April 29, 2014

Time: 9:30 a.m.

Room: Courtroom G, 15th Floor

1 The parties hereby stipulate and request that this Court continue the status conference in
2 this matter from Tuesday, April 29, 2014 to Tuesday, May 20, 2014, at 9:30 a.m. This
3 continuance is requested to allow the defense time to review discovery, conduct legal research,
4 and provide factual and legal information to the United States. This continuance will also allow
5 sufficient time for the parties to engage in discussions regarding coming to an agreed-upon
6 resolution in this matter.

7 The parties, therefore, request that this Court exclude time pursuant to 18 U.S.C. §
8 3161(b) (which governs the timing for return of an indictment or information), and extend the
9 time within which defendant is entitled to a preliminary hearing pursuant to Federal Rules of
10 Criminal Procedure 5.1(c) and (d).

11
12 IT IS SO STIPULATED.

13
14 Dated: April 16, 2014

Respectfully Submitted,

15 /s/

16 _____
17 Miles Ehrlich
18 Amy Craig
19 Ramsey & Ehrlich LLP
20 Counsel to John Ching En Lee

21 /s/

22 _____
23 James C. Mann
24 Assistant United States Attorney

25 IT IS SO ORDERED.

26 Dated: 4/17/14 _____

